

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 05-15-SLR
	:	
JOSEPH PRYER,	:	
	:	
Defendant.	:	

MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

Defendant, Joseph Pryer, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an order enlarging the time within which pretrial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions for this case are due by May 5, 2005.
2. Discovery for this case was not received by defense counsel until April 26, 2005.
3. Defense counsel requires additional time to review the discovery and to speak with Mr. Pryer to discuss how the defense is going to proceed. Defense counsel is not able to determine which pre-trial motions, if any, need to be filed until she has the adequate opportunity to review the discovery and to speak with Mr. Pryer regarding this case.
4. Keith Rosen, Esquire, the attorney handling the case for the government, does not object to the enlargement of time.
5. The parties have agreed that any additional time given in which to file pre-trial motions will be excludable under the Speedy Trial Act.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended to any time after May 26, 2005.

Respectfully Submitted,

/s/ Eleni Kousoulis
Eleni Kousoulis, Esquire
Assistant Federal Public Defender
First Federal Plaza
704 King Street, Suite 110
Wilmington, Delaware 19801
Attorney for Defendant Joseph Pryer

Dated: May 4, 2005

CERTIFICATE OF SERVICE

Undersigned counsel certifies that a copy of Defendant's Motion to Extend Time to File Pretrial Motions is available for public viewing and downloading and was electronically delivered on May 4, 2005, to:

Keith Rosen, Esquire
Assistant U.S. Attorney
1007 Orange Street
Suite 700, P.O. Box 2046
Wilmington, DE 19899-2046

/s/ Eleni Kousoulis
Eleni Kousoulis, Esquire
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DATED: May 4, 2005